

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MIKE KREIDLER, Insurance Commissioner for
the State of Washington and as Receiver for
Cascade National Insurance Company, in
Liquidation,

Plaintiff,

v.

DANNY L. PIXLER and ROXANN PIXLER,
individually and their marital community;
ANTHONY HUFF and SHERI HUFF,
individually and their marital community;
AMERICAN STAFF RESOURCES OF
CALIFORNIA, INC., a Delaware corporation;
CERTIFIED SERVICES, INC., a Nevada
corporation; MIDWEST MERGER
MANAGEMENT, LLC, a Kentucky Limited
Liability Company; and JOHN DOES 1 – 10,

Defendants.

NO. C06-697 RSL

SUPPLEMENTAL DECLARATION OF
VICTORIA L. VREELAND IN SUPPORT
OF PLAINTIFF'S MOTION FOR ORDER
ESTABLISHING A DISCOVERY PLAN

**NOTED FOR MOTION CALENDAR:
July 20, 2007**

Victoria L. Vreeland declares and states as follows:

1. I am an attorney and one of the counsel of record for plaintiff in this matter. I

am competent to make this Declaration, which is based upon personal knowledge.

SUPPLEMENTAL DECLARATION OF
VICTORIA L. VREELAND IN SUPPORT
OF PLAINTIFF'S MOTION FOR ORDER
ESTABLISHING A DISCOVERY PLAN

1 I am an attorney and one of the counsel of record for plaintiff in this matter. I
2 am competent to make this Declaration, which is based upon personal knowledge.

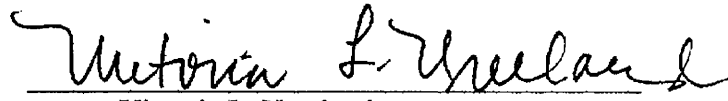
3 2. Attached hereto are true and correct copies of the following:

4 **Exhibit A** June 20, 2007, letter from plaintiff's counsel to defense
5 counsel;

6 **Exhibit B** July 17, 2007, letter from plaintiff's counsel to defense
7 counsel.
8

9 I declare under penalty of perjury of the laws of the State of Washington that the
10 above is true and correct to the best of my knowledge and belief.

11 Dated this 20th day of July, 2007, at Redmond, Washington.

12
13 
14 Victoria L. Vreeland

15
16
17
18
19
20
21
22
23
24
25
26
SUPPLEMENTAL DECLARATION OF
VICTORIA L. VREELAND IN SUPPORT
OF PLAINTIFF'S MOTION FOR ORDER
ESTABLISHING A DISCOVERY PLAN

PAGE 2 of 2
No. 006 697 PSI

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
800 UNIVERSITY STREET, SUITE 2100
Seattle, Washington 98101
(206) 676-7500 • FACSIMILE (206) 676-7575

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on July 20, 2007, I electronically filed the following: (1) Plaintiff's Reply to Defendants' Response to Plaintiff's Motion for Order Establishing a Discovery Plan; (2) Supplemental Declaration of Victoria L. Vreeland in Support of Plaintiff's Motion for Order Establishing a Discovery Plan, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Paul E. Fogarty
Burkett, Burdette & Fogarty PLLC
600 Stewart Street, Suite 1500
Seattle, WA 98101-1246
pfogarty@bbf-lawyers.com

David W. Hemminger
Donald L. Cox
Lynch, Cox, Gilman & Mahan, PSC
500 West Jefferson Street, Suite 2100
Louisville, KY 40202
dhemminger@lcgandm.com
doncox@lcgandm.com

DATED this 20th day of July, 2007.

s/Kristin A. Larkin
Kristin A. Larkin
Assistant to Victoria Vreeland
and Donald Cohen

SUPPLEMENTAL DECLARATION OF
VICTORIA L. VREELAND IN SUPPORT
OF PLAINTIFF'S MOTION FOR ORDER
ESTABLISHING A DISCOVERY PLAN